



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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MAR 22 2013

Ref: 8EPR-N

Dan Wenk, Superintendent
Yellowstone National Park
c/o Winter Use Plan/SEIS
P.O. Box 168, Yellowstone National Park
Mammoth, Wyoming 82190

Re: Yellowstone National Park Final Winter
Use Plan/Supplemental Environmental Impact
Statement; CEQ # 20130058

Dear Superintendent Wenk:

The U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the U.S. Department of Interior, National Park Service's (NPS) February 2013 Final Winter Use Plan (Plan) Supplemental Environmental Impact Statement (SEIS) for Yellowstone National Park (Park). Our review was conducted in accordance with the EPA's responsibilities under section 102 of the National Environmental Policy Act (NEPA), 42 U.S.C. § 4332(2)(c), and Section 309 of the Clean Air Act, 42 U.S.C. § 7609. Section 309 of the Clean Air Act directs the EPA to review and comment in writing on the environmental impacts of any major federal agency action.

NPS Preferred Alternative

The Preferred Alternative, Alternative 4, proposes a new approach to managing oversnow vehicle (OSV) use by setting a maximum number of daily transportation events to access the Park. The NPS defines a single transportation event as either a group of seven snowmobiles (on average) or one snowcoach. The NPS's new approach is based on the concept that both types of transportation events present a comparable visitor experience and environmental impact. The Preferred Alternative would permit no more than 110 transportation events daily, with up to 50 of those events allocated to groups of snowmobiles. New best available technology (BAT) standards for both snowcoaches and snowmobiles would be implemented in the 2017/2018 winter season, and four non-commercially guided snowmobile groups would be permitted daily. The Park also establishes a framework that provides incentives for OSVs to increase their daily average event size by meeting additional environmental performance criteria.

Final SEIS Comments

The EPA appreciates the opportunities the NPS has afforded us, as a Cooperating Agency, to collaborate on issues related to air quality modeling, snowmobile emission factors, snowcoach BAT and adaptive management. We appreciate the NPS's receptiveness to recommendations from both Region 8 and our Office of Transportation and Air Quality (OTAQ) experts. The EPA agrees with the approach taken in the Final EIS in response to our Draft EIS recommendations for air quality modeling, vehicle emissions, and snowcoach BAT. Additionally, our review of the Final EIS found an improved adaptive

management plan designed to sustain or improve upon the protections provided by the preferred alternative.

Air Quality Modeling Analysis and Representative Emissions

The EPA supports the direction taken pertaining to our modeling recommendations, including where the NPS's selected approach differed from the EPA's original recommendations regarding the Class II snowcoach BAT definition and which snowcoaches meet that BAT definition. We find that the refined definition of snowcoach BAT in Appendix B of the Final SEIS outlines a practical and achievable technology-based means to improve snowcoach emissions performance. The rationale included in the Final SEIS concerning air quality modeling supports the NPS's decision process, and in light of this information, we agree with the NPS's approaches for the Chevy Express snowcoach and the 2011 Arctic Cat.

Adaptive Management and Monitoring

The Final SEIS includes helpful detail in Appendix B for the Adaptive Management and Monitoring Framework (Framework). The Framework includes implementation objectives that focus on building an understanding of the Preferred Alternative and its comparability concept through data collection. The Framework also includes goals to ensure that impacts remain within the range predicted in the Final SEIS as well as a process to involve the public and interested stakeholders to continually evaluate the effectiveness of the management plan and seek resource protection improvements. The Framework more distinctly defines impact thresholds and commits to management actions if monitoring indicates an impact has exceeded the predicted intensity level (minor, moderate, major). For impacts to soundscape and air quality, the Final SEIS states that the NPS will strive to keep actual levels at or near the specific levels projected from modeled data, even in instances where the levels do not exceed intensity thresholds but are higher than what was predicted. The NPS further illustrates its commitment to improve winter use management through its plan to create a position to oversee development and initial implementation of the adaptive management strategy. The EPA supports the Framework, and we believe it, in combination with enhanced-BAT, offers the potential to improve resource protections over time as the NPS gains experience in managing winter use under a new structure.

The additions to the Final SEIS mentioned above have resulted in an improved document that more clearly outlines the Park's goals to maintain and improve resource protections under the new management approach. The EPA welcomes the opportunity to work with and support the NPS through its adaptive management stakeholder process to protect the unique winter resources at Yellowstone National Park, while seeking long-term resource protection improvements. If we may provide further assistance as a Cooperating Agency during this stage of your planning process, please contact Phil Strobel, Deputy Director of our NEPA Compliance and Review Program at 303-312-6704, or your staff may contact Melanie Wasco, Lead NEPA Reviewer, at 303-312-6540.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Suzanne J. Bohan', with a long horizontal flourish extending to the right.

Suzanne J. Bohan
Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation